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November 30, 2017

Via Email

Magistrate Judge Martin C. Carlson
Ronald Reagan Federal Bldg. & U.S. Courthouse
228 Walnut Street
Harrisburg, PA 17108-0983
magistrate_judge_carlson@pamd.uscourts.gov


**Re: *Julie Ellen Wartluft f/k/a Julie Ellen Bartels and Frederick L. Bartels, Jr.,
Individually and as Administrators of the Estate of Abrielle Kira Bartels,
Deceased v. Milton Hershey School, et al.
Civil Action No. 1:16-cv-2145-CCC (M.D. Pa.)***

Dear Judge Carlson:

We represent Defendants in the above-referenced action. Pursuant to the Court's October 30, 2017 Order (Dkt. 98), enclosed please find a proposed Qualified Protective Order governing the production of medical or mental health records, related documents, and the December 4, 2017, deposition of Leslie Davis. The parties and counsel for Pinnacle Health, and Ms. Davis all concur with the proposed Qualified Protective Order.

Accordingly, we respectfully request that the Court enter the attached proposed Order. We are, of course, available to discuss the proposed Order at the Court's convenience. Thank you for your timely consideration.

Respectfully submitted,



Kyle M. Elliott

/kme

Enclosures

(via email)

cc: Jarad W. Handelman, Esquire
John DeLorenzo, Esquire
Gregory F. Cirillo, Esquire
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Kevin J. Neary